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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

LYNN SLOVIN, an individual, on her own
behalf and on behalf of all others similarly
situated,

Plaintiff,

v.

SUNRUN, INC., a California corporation,
CLEAN ENERGY EXPERTS, LLC, a
California limited liability company doing
business as SOLAR AMERICA, and DOES 1
through 5, inclusive,

Defendants.

Case No. 4:15-cv-05340-YGR

(Hon. Yvonne Gonzalez Rogers)

**DECLARATION OF DR. BEAU
PEELLE IN SUPPORT OF
DEFENDANTS' MOTION TO STRIKE
CLASS ALLEGATIONS**

*[Notice of Motion & Motion, Mazzuchetti
Decl., Long Decl., and [Proposed] Order
filed concurrently herewith]*

TAC Filed: July 12, 2016
Trial Date: None Set

DECLARATION OF DR. BEAU PEELE

I, Dr. Beau Peelle, declare as follows:

1. I am Co-Founder and President of Clean Energy Experts, LLC ("CEE"). I oversee CEE's operations. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein.

2. I have gathered information from an authorized employee with personal knowledge that Epath Media ("Epath") has refused to provide CEE with the opt-in information associated with the call to Jeffrey Price that Epath transferred to CEE on April 2, 2014.

3. I have direct contact with third party vendors that provide leads to CEE. I have never heard of Sure Touch Leads / Leads Row ("Sure Touch"). CEE has no dealings or relationship with Sure Touch. CEE does not purchase any leads from Sure Touch.

4. CEE requests that third party vendors provide CEE with all names that they use during calls with leads. CEE is not aware of any third party vendor that uses the name "U.S. Solar" on calls with leads. CEE itself does not use the name "U.S. Solar" during calls with any leads.

5. Attached as Exhibit "A" is a true and correct copy of a redacted version of CEE's contract with Epath Media.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 18 August, 2016, in Los Angeles, California.


DR. BEAU PEELE